

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MOTION TO EXTEND DISCOVERY AND OTHER DEADLINES

AND NOW comes Defendant, Elk Regional Health Center (the "Health Center"), by and through its attorneys, Cohen & Grigsby, P.C., and files the following Motion to Extend Discovery and Other Deadlines, and in support thereof, avers as follows:

1. On May 6, 2005, Plaintiff filed a Complaint alleging that the Health Center discriminated against her on the basis of her age and sex in violation of the Age Discrimination in Employment Act (“ADEA”) and Title VII of the Civil Rights Act of 1964 (“Title VII”). The Health Center filed its Answer and Defenses on July 6, 2005.

2. On August 17, 2005, the parties submitted a Joint F.R.C.P. 26(f) Report and Proposed Case Management Order setting forth various deadlines for case management purposes.

3. On August 19, 2005, during the initial Rule 16 Scheduling Conference, the Court adopted the parties' Proposed Case Management Order as the Court's Case Management Order. The Court directed the parties to complete discovery by December 26, 2005.

4. The parties are in the process of conducting discovery, but need more time to adequately and fairly explore matters at issue in this case.

5. Defendant requests this Honorable Court to extend the deadline for discovery and all other deadlines by sixty (60) days. The parties expect to complete all necessary discovery within this sixty (60) day period.

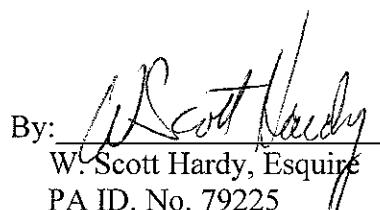
6. Plaintiff consents to the filing of this motion.

WHEREFORE, Defendant, Elk Regional Health Center, requests that this Honorable Court extend the deadline for discovery and all other deadlines set forth in the Case Management Order by sixty (60) days.

Respectfully submitted,

COHEN & GRIGSBY, P.C.

By:


W. Scott Hardy, Esquire
PA ID. No. 79225

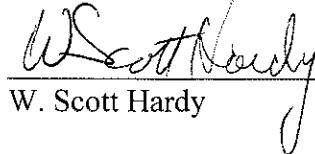
11 Stanwix Street
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(412) 297-4900

Counsel for Defendant
Elk Regional Health Center

Dated: December 21, 2005

LOCAL RULE 16.1.2.F CERTIFICATION

I, W. Scott Hardy, counsel for Defendant Elk Regional Health Center, certify, pursuant to Rule 16.1.2.F of the Local Rules of the United States District Court for the Western District of Pennsylvania, that I have conferred with Plaintiff's counsel with respect to the matters set forth in this Motion and all parties consent to the filing of this Motion.


W. Scott Hardy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Motion to Extend Discovery and Other Deadlines was served via United States First Class Mail, Postage Prepaid on the 21st day of December, 2005, upon the following:

Jerome J. Kaharick, Esq.
Michael Csonka, Esq.
Jerome J. Kaharick and Associates
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Suites 301 and 302
406 Main Street
Johnstown, Pennsylvania 15901

(Counsel for Plaintiff Valerie Hanes)


W. Scott Hardy